

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

TRANS-HIGH CORPORATION, INC.  
d/b/a High Times

Plaintiff,

v.

PAUL WESTEN and  
HIGH TIMES TRAVEL, LLC,

Defendants.

Case No.

COMPLAINT

JURY TRIAL DEMANDED

Plaintiff, Trans-High Corporation, Inc. d/b/a High Times (hereinafter "Plaintiff") for its Complaint against Defendants, High Times Travel, LLC ("High Times Travel") and Paul Westen ("Westen") (collectively, "Defendants") hereby alleges as follows:

**NATURE OF ACTION**

1. Plaintiff brings this action for (i) trademark infringement in violation of § 32(1) of the Lanham Trademark Act (the "Lanham Act"), 15 U.S.C. § 1114(1); (ii) false representations, descriptions and designations of origin in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a); (iii) trademark cyberpiracy under the Trademark Cyberpiracy Prevention Act, in violation of Section 43(d)(1), 15 U.S.C. § 1125(d)(1) of the

1 Lanham Act; (iv) unfair methods of competition and trade practices in business and  
 2 fraudulent misrepresentation in violation of the Washington Consumer Protection Act,  
 3 R.C.W. § 19.86.020; (v) unfair competition in violation of the common law of the State of  
 4 Washington; and (vi) trademark infringement in violation of the common law of the State of  
 5 Washington.

6 2. For many years, Plaintiff has marketed its well-known counter-culture  
 7 publication HIGH TIMES magazine and various goods and services related to the subject of  
 8 cannabis, drug law reform and alternative lifestyles, under its distinctive HIGH TIMES and  
 9 related trademarks. Plaintiff has also organized cannabis-themed festivals and events and has  
 10 authorized others to use Plaintiff's marks in the promotion and rendering of travel-related  
 11 services in connection with such festivals and events. In an attempt to profit from the good  
 12 will Plaintiff has developed in its HIGH TIMES brand and to confuse and mislead the  
 13 consuming public into believing that Defendants are affiliated with or endorsed by Plaintiff,  
 14 Defendants have willfully infringed those marks adopting the name High Times Travel,  
 15 LLC to promote cannabis-themed vacation and travel packages through the website  
 16 [www.hightimestravel.com](http://www.hightimestravel.com).

17 3. Plaintiff brings this action for damages and injunctive relief, among other  
 18 reasons, (i) to prevent Defendants from infringing Plaintiff's trademarks; (ii) to prevent  
 19 Defendants from registering, trafficking in and/or using an internet domain name  
 20 [www.hightimestravel.com](http://www.hightimestravel.com) (the "Domain Name"), which is nearly identical to and  
 21 incorporates Plaintiff's registered trademarks, with a bad faith intent to profit therefrom; (iii)  
 22 to obtain damages and other appropriate relief resulting from the violations as set forth herein.

### 23 JURISDICTION AND VENUE

24 4. This Court has jurisdiction over the claims arising under the Lanham Act  
 25 pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338.

26 5. This Court has supplemental jurisdiction over the claims arising under the laws

of the State of Washington pursuant to 28 U.S.C. § 1367.

6. Venue is proper pursuant to 28 U.S.C. § 1391 because one or more of the Defendants resides in this District.

### **THE PARTIES**

7. Plaintiff is a corporation organized and existing under the laws of the State of New York with offices located at 250 West 57<sup>th</sup> Street, Suite 920, New York, New York 10107.

8. Plaintiff is engaged, inter alia, in the business of publishing HIGH TIMES magazine, organizing and hosting cannabis-themed festivals, seminars, contests and other events throughout the United States and around the world, and in merchandising and selling a wide variety of related goods and services.

9. Upon information and belief, High Times Travel, LLC is limited liability company with offices located at 1420 5<sup>th</sup> Avenue, Seattle, WA 98101.

10. Upon information and belief, High Times Travel is engaged in the business of promoting and selling cannabis-themed vacation packages via its Internet website, [www.hightimestravel.com](http://www.hightimestravel.com).

11. Upon information and belief, Westen is a principal of High Times Travel with an email address at PaulWeston@Outlook.com.

### **FACTUAL BACKGROUND**

#### ***A. Plaintiff's Business and Trademarks***

12. Plaintiff has been publishing HIGH TIMES magazine, a monthly periodical, since 1974. HIGH TIMES magazine is widely recognized as the largest and most influential publication in the world covering hemp counterculture, and focusing on the medical and recreational uses of marijuana and the reformation of drug laws. Celebrities such as Arnold Schwarzenegger, Oliver Stone, Bob Dylan, Jerry Garcia, Jimmy Buffet, Jack Black, Sacha Baron Cohen, Woody Harrelson, Mick Jagger and Bob Marley have been featured on the

cover of the magazine and some of the leading literary and cultural voices of the 20<sup>th</sup> Century, such as writers William S. Burroughs, Truman Capote, Hunter S. Thompson, screenwriter Bruce Jay Friedman, visual artist Andy Warhol, musicians Frank Zappa, Joey Ramone and Peter Tosh and political activist Jerry Rubin, among many others, have contributed material to the publication.

13. In 2008, Plaintiff launched a digital edition of the HIGH TIMES magazine via the Internet website, [www.hightimes.com](http://www.hightimes.com), further expanding the magazine's distribution and notoriety both domestically and abroad.

14. In addition to use in connection with the magazine, Plaintiff has also consistently used the HIGH TIMES name and trademarks in connection with the promotion, provision and sale of a wide variety of goods and services which consumers have come to associate with Plaintiff and the HIGH TIMES magazine. Plaintiff has marketed, promoted and sold these goods and services through various channels including its magazine, which is distributed domestically and internationally, and through the HIGHTIMES.COM website, originally launched in 1996.

15. Plaintiff is the owner of trademark registrations for HIGH TIMES and related marks (hereinafter the "HIGH TIMES Marks") on the Principal Register of the United States Patent & Trademark Office, including the following:

| MARK       | REG. NO. | REG. DATE | GOODS/SERVICES  |
|------------|----------|-----------|---|
| HIGH TIMES | 4069371  | 12/13/11  | Class 9: Electrical apparatus, namely, pre-recorded audio recordings featuring music; pre-recorded video recordings about hemp<br>Class 16: Magazines about hemp<br>Class 25: For sweatshirts, caps |
| HIGH TIMES | 1883561  | 3/14/95   | Class 16: Magazines about hemp  |
| HIGH TIMES | 2766982  | 9/23/03   | Class 16: Posters<br>Class 25: Jackets  |
| HIGH TIMES | 2386838  | 9/19/00   | Class 25: T-shirts  |
| HIGH TIMES | 3025055  | 12/13/05  | Class 41: Entertainment services in the nature of production and distribution of motion picture   |

| MARK                      | REG. NO. | REG. DATE | GOODS/SERVICES  |
|---------------------------|----------|-----------|---|
|                           |          |           | films   |
| HIGH TIMES                | 2856379  | 6/22/04   | Class 9: Electrical apparatus, namely, pre-recorded phonograph records, compact discs, audio and video cassettes, and dvds featuring music. |
| HIGH TIMES & PHOENIX LOGO | 3815134  | 7/6/10    | Class 16: Posters<br>Class 25: Shirts, t-shirts   |
| HIGH TIMES COMEDY         | 3515068  | 10/14/08  | Class 41: Entertainment services in the nature of live comedy   |

16. Plaintiff also owns registrations for cannabis-related marks on the Principal Register of the United States Patent & Trademark Office, including the following:

| MARK                 | REG. NO. | REG. DATE | GOODS/SERVICES   |
|----------------------|----------|-----------|--|
| CANNABIS CUP         | 2289974  | 11/2/99   | Class 16: Books in the field of cannabis<br>Class 25: Clothing, namely t-shirts  |
| CANNABIS CUP         | 2581279  | 6/18/02   | Class 35: Organization and arrangement of conventions and fairs in the field of cannabis<br>Class 41: Organization and arrangement of exhibitions, harvest festivals featuring a variety of activities, namely art and craft exhibitions, organization and arrangement of educational and instructional seminars and conferences in the field of cannabis; organization and arrangement of exhibitions for educational, cultural and entertainment purposes in the field of cannabis |
| MEDICAL CANNABIS CUP | 4272627  | 1/8/13    | Class 16: Series of books about hemp; posters<br>Class 25: T-shirts, sweatshirts, caps   |
| MEDICAL CANNABIS CUP | 4259895  | 12/18/12  | Class 41: Organization and arrangement of educational and instructional seminars and conferences regarding legal, medical and political developments and societal attitudes about medical marijuana not including the provision or   |

| MARK | REG. NO. | REG. DATE | GOODS/SERVICES   |
|------|----------|-----------|--|
|      |          |           | display of marijuana, marijuana-based preparations, or marijuana extracts or derivatives, synthetic marijuana, or other substances controlled by the controlled substances act; organization and arrangement of exhibitions for educational, cultural and entertainment purposes regarding legal, medical, and political developments and societal attitudes about medical marijuana not including the provision or display of marijuana, marijuana-based preparations, or marijuana extracts or derivatives, synthetic marijuana, or other substances controlled under the controlled substances act; organization and arrangement of musical exhibitions |

17. Registration Numbers 2,289,974, 2,581,279, 1,883,561, 2,766,982, 2,386,838, 3,025,055, 2,856,379 are incontestable.

18. Plaintiff is also the owner of a number of domain names which incorporate the HIGH TIMES Marks and/or Plaintiff's CANNABIS marks, including, HIGHTIMES.COM, HIGH-TIMES.DE, HIGHTIMESCANNABISCUP.COM, HIGHTIMES-POTLUCK.COM, HIGHTIMESPOTLUCK.COM, MISSHIGHTIMES.COM, MEDICALCANNABISCUP.US, CANNABISCUP.COM and MEDCANCUP.COM.

19. In addition, Plaintiff has used the HIGH TIMES Marks in connection with the sponsorship and organization of well-known and highly publicized cannabis-themed events and competitions such as the international CANNABIS CUP held annually in Amsterdam since 1987, and the MEDICAL CANNABIS CUP, first held in San Francisco, California in 2010, with subsequent events taking place in Los Angeles, California and Denver, Colorado. In 2005, Plaintiff launched its MISS HIGH TIMES contest, a competition among female

1 readers of the HIGH TIMES magazine, now held annually, which has been hosted in various  
 2 locations, including Jamaica. Hereinafter, the CANNABIS CUP, MEDICAL CANNABIS  
 3 CUP and MISS HIGH TIMES contest are referred to as the "HIGH TIMES Events."

4 20. In connection with the HIGH TIMES Events, Plaintiff has entered into  
 5 agreements with various travel agencies and service providers, including Sun Splash Tours,  
 6 Wake and Bake Travel and CS Travel whereby such agencies were granted permission to  
 7 offer travel and other services related to HIGH TIMES Events.

8 21. Plaintiff has extensively advertised and promoted its products and services,  
 9 including its services related to the cannabis-themed HIGH TIMES Events described above,  
 10 under the HIGH TIMES Marks through various media.

11 22. As a result of Plaintiff's widespread use of the HIGH TIMES Marks in  
 12 connection with its products and services, Plaintiff's substantial investment of time, money  
 13 and effort in advertising and promoting its HIGH TIMES Marks and the services offered  
 14 thereunder, and the unsolicited media attention HIGH TIMES and its HIGH TIMES Marks  
 15 have received, the HIGH TIMES Marks have developed substantial public recognition among  
 16 members of the consuming public.

17 23. As such, the HIGH TIMES Marks operate as unique source identifiers  
 18 associated with Plaintiff and its product and services and possess significant goodwill of great  
 19 value to Plaintiff.

20 ***B. Defendants' Unlawful Activities***

21 24. Upon information and belief, High Times Travel is engaged in the business of  
 22 promoting and selling cannabis-themed vacation packages via its Internet website,  
 23 [www.hightimestravel.com](http://www.hightimestravel.com), available worldwide. According to Defendants' website, High  
 24 Times Travel is the "World's only Cannabis Vacation Club," and through the website,  
 25 Defendants provide travel packages to destinations such as Jamaica, Amsterdam and Denver,  
 26 locations where Plaintiff hosts, or has hosted, HIGH TIMES Events. Attached hereto as



1 Exhibit A are printouts from Defendants' High Times Travel website and Facebook page.

2 25. Defendants' High Times Travel trademark and name and the  
3 hightimestravel.com domain name (the "Infringing Marks") are nearly identical to and  
4 confusingly similar to the HIGH TIMES Marks. The marks are phonetically and visually  
5 similar, differing only by the addition of the common term "travel," and convey the same  
6 commercial impression.

7 26. Upon information and belief, Defendants are attempting to trade upon  
8 Plaintiff's intellectual property, reputation and good will by using the Infringing Marks in an  
9 effort to mislead the public into thinking that Defendants are affiliated with or licensed by  
10 Plaintiff.

11 27. Given the close similarity between the Infringing Marks and the HIGH TIMES  
12 Marks and the services they respectively designate, consumers familiar with Plaintiff's HIGH  
13 TIMES magazine and other products and services, including the HIGH TIMES Events, will  
14 likely assume, incorrectly, that High Times Travel's services originate with Plaintiff or that  
15 there is an affiliation between the parties, or that Plaintiff has sponsored, endorsed, or  
16 approved High Times Travel's services.

17 28. Use of the Infringing Marks in connection with Defendants' services is likely  
18 to cause confusion as to the source and origin of Defendants' services and to cause mistake, or  
19 to deceive the public by misleading consumers into believing that Defendants' services  
20 emanate from, are approved, authorized, endorsed or sponsored by, or are in some way  
21 associated or connected with Plaintiff.

22 29. On information and belief, High Times Travel was aware of Plaintiff's HIGH  
23 TIMES Marks prior to use of the Infringing Marks, but nevertheless chose to violate  
24 Plaintiff's rights with regard to those marks.

25 30. On June 12, 2013, Plaintiff's counsel sent a letter to Defendants advising them  
26 that their use of the Infringing Marks violated Plaintiff's exclusive rights in the HIGH TIMES



1 Marks, and demanding that Defendants cease any and all use of the Infringing Marks in  
 2 connection with Defendants' cannabis-themed services and website. As of yet, Defendants  
 3 have refused to respond or otherwise comply with Plaintiff's demands.

4 31. Defendants' conduct as described above has caused and, unless restrained and  
 5 enjoined by this Court, will continue to cause irreparable harm to Plaintiff, for which Plaintiff  
 6 has no adequate remedy at law.

7 **FIRST CAUSE OF ACTION**

8 **(TRADEMARK INFRINGEMENT AGAINST ALL DEFENDANTS – FEDERAL)**

9 32. Plaintiff repeats, reiterates and realleges each and every allegation set forth in  
 10 paragraphs 1 through 31 thereof with the same force and effect as if fully set forth herein.

11 33. This claim arises under the provisions the Lanham Act, 15 U.S.C. § 1114(1),  
 12 and is for infringement of registered trademarks.

13 34. Defendants' use of the Infringing Marks is intended to capitalize on the good  
 14 will and reputation of Plaintiff's registered HIGH TIMES Marks.

15 35. The activities of Defendants complained of herein constitute willful and  
 16 intentional infringement of Plaintiff's HIGH TIMES Marks.

17 36. The activities of Defendants complained of herein constitute willful and  
 18 intentional infringement of Plaintiff's HIGH TIMES Marks in disregard of Plaintiff's rights,  
 19 and were commenced and have continued in spite of Defendants' knowledge that the  
 20 unauthorized use of Plaintiff's HIGH TIMES Marks, or a copy or colorable imitation thereof,  
 21 was, and is, in direct contravention of Plaintiff's rights.

22 37. Defendants' use of Plaintiff's HIGH TIMES Marks is likely to cause confusion  
 23 and mistake in the minds of the purchasing public and, in particular, tends to, and does, create  
 24 the impression that Defendants' products emanate from, are approved or sponsored by, or are  
 25 in some way associated or connected with Plaintiff's products and services when, in fact, they  
 26 are not.

1           38. Plaintiff has no adequate remedy at law and is suffering immediate and  
2 irreparable harm and damage as a result of the acts of Defendants complained of herein in an  
3 amount thus far not determined.

4                               **SECOND CAUSE OF ACTION**

5                   **(UNFAIR COMPETITION AGAINST ALL DEFENDANTS – FEDERAL)**

6           39. Plaintiff repeats, reiterates and realleges each and every allegation set forth in  
7 paragraphs 1 through 38 thereof with the same force and effect as if fully set forth herein.

8           40. This claim arises under Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a),  
9 and alleges the use in commerce of false designations of origin in false descriptions in  
10 representations.

11           41. Defendants have used, and will continue use, in connection with their sale and  
12 marketing of products and services, false designations of origin and false designations, words,  
13 which tend falsely to describe or represent that such services and products are Plaintiff's  
14 services or products or are approved or sponsored by Plaintiff, and/or that Defendants are  
15 affiliated, sponsored, owned or controlled by Plaintiff, and have caused or will cause such  
16 services and products to enter into commerce with full knowledge of the falsity of such  
17 misleading designations of origin in such descriptions and representations, all to the detriment  
18 of Plaintiff.

19           42. Upon information and belief, Defendants have offered or will offer for sale  
20 services and products using copies, or colorable imitations, of Plaintiff's HIGH TIMES Marks  
21 with the express intent to cause confusion and mistake, to deceive and mislead the purchasing  
22 public, to trade upon the reputation of Plaintiff, and improperly to appropriate the valuable  
23 trademark rights of Plaintiff.

24           43. Plaintiff has no adequate remedy at law, and is suffering immediate and  
25 irreparable harm and damage as a result of the acts of Defendants complained of herein in an  
26 amount thus far not determined.

**THIRD CAUSE OF ACTION**

**(CYBERPIRACY AGAINST ALL DEFENDANTS – FEDERAL)**

44. Plaintiff repeats, reiterates and realleges each and every allegation set forth in paragraphs 1 through 43 thereof with the same force and effect as if fully set forth herein.

45. This claim arises under the provisions of the Lanham Act, 15 U.S.C. § 1125(d), and is for the prevention of cyberpiracy.

46. Defendants have registered, trafficked in and/or used the Domain Name in a bad faith in an attempt to profit from Plaintiff's HIGH TIMES Marks, which have become distinctive long prior to Defendants' registration of the Domain Name.

47. Plaintiff has no adequate remedy at law, and is suffering immediate and irreparable harm and damage as a result of the acts of Defendants complained of herein in an amount thus far not determined.

**FOURTH CAUSE OF ACTION**

**(VIOLATION OF THE WASHINGTON STATE CONSUMER PROTECTION ACT)**

48. Plaintiff repeats, reiterates and realleges each and every allegation set forth in paragraphs 1 through 47 thereof with the same force and effect as if fully set forth herein.

49. The use by Defendants of the Infringing Marks infringes Plaintiff's HIGH TIMES Marks and constitutes an unfair method of competition in business and an unfair trade practice in business, as well as a fraudulent representation, which are damaging to the public interest in violation of the Washington Consumer Protection Act, R.C.W. § 19.86.020.

50. The use by Defendants of the Infringing Marks that infringes Plaintiff's HIGH TIMES Marks in connection with cannabis-related travel services has been knowing, willful, and deliberate.

51. Plaintiff has been and will continue to be irreparably injured by reason of Defendants' unfair methods of competition and unfair trade practices in violation of the Washington Consumer Protection Act. Such irreparable injury will continue unless the acts

1 of Defendants are enjoined during the pendency of this action and thereafter.

2 52. Plaintiff has been damaged by Defendants' actions in an amount to be proven  
3 at trial.

4 **FIFTH CAUSE OF ACTION**

5 **(UNFAIR COMPETITION – WASHINGTON COMMON LAW AGAINST ALL**  
6 **DEFENDANTS)**

7 53. Plaintiff repeats, reiterates and realleges each and every allegation set forth in  
8 paragraphs 1 through 52 thereof with the same force and effect as if fully set forth herein.

9 54. This claim arises under the common law of the State of Washington relating to  
10 trademark infringement and unfair competition.

11 55. The improper use by Defendants of the Infringing Marks confusingly similar to  
12 the HIGH TIMES Marks of Plaintiff, Defendants' misappropriation of Plaintiff's HIGH  
13 TIMES Marks, and other unfair activities constitute unfair competition and a violation of the  
14 common law rights of Plaintiff under the laws of the State of Washington.

15 56. The foregoing activities were, and are, likely to cause confusion or mistake  
16 among the consumers as to the origin or affiliation of Defendants' unauthorized sales and  
17 services. The unfair competition of Defendants has caused, and will cause, irreparable injury  
18 and damage to the business, reputation, and goodwill of Plaintiff. Such irreparable injury will  
19 continue unless the acts of Defendants are enjoined during the pendency of this action and  
20 thereafter.

21 57. Plaintiff has been damaged by Defendants' actions in an amount to be proven  
22 at trial.

23 **SIXTH CAUSE OF ACTION**

24 **(TRADEMARK INFRINGEMENT – WASHINGTON COMMON LAW AGAINST**  
25 **ALL DEFENDANTS)**

26 58. Plaintiff repeats, reiterates and realleges each and every allegation set forth in

1 paragraphs 1 through 57 thereof with the same force and effect as if fully set forth herein.

2 59. This claim arises under the common law of the State of Washington relating to  
3 trademark infringement.

4 60. The improper use by Defendants of a name and mark confusingly similar to the  
5 HIGH TIMES Marks of Plaintiff were, and are, likely to cause confusion or mistake among  
6 consumers as the origin or affiliation of Defendants' unauthorized sales, products or services.

7 **PRAYER FOR RELIEF**

8 WHEREFORE, Plaintiff respectfully requests judgment against Defendants as  
9 follows:

10 1. That a preliminary and permanent injunction be entered against Defendants  
11 and their agents, servants, representatives, employees, successors and/or assigns, and all  
12 persons or companies in active concert and/or participation with them, preliminarily and  
13 permanently enjoining them from (a) using any marks, including but not limited to HIGH  
14 TIMES, or any other terms, comprising or containing the term HIGH TIMES alone or with  
15 other elements, or any marks confusingly similar to the HIGH TIMES Marks, or which are  
16 likely to suggest a connection with Plaintiff, or committing any other act, which falsely  
17 represents or which has the effect of falsely representing, that the goods or services of  
18 Defendants or of any third party are licensed, authorized by, endorsed or in any way  
19 associated with Plaintiff; (b) registering, trafficking, using, advertising, offering to sell or  
20 selling the Domain Name, or any other domain name using the term HIGH TIMES or any  
21 other confusingly similar domain names; (c) committing any other acts which falsely  
22 represent or which have the effect of falsely representing that Defendants and their services  
23 are associated with, authorized, endorsed or sponsored by Plaintiff; or (d) otherwise  
24 competing unfairly with HIGH TIMES or retaining the benefits of any past unfair  
25 competition.  
26

2. That pursuant to 15 U.S.C. § 1116(a), Defendants be directed to file with the Court and serve upon Plaintiff, within 30 days after entry of final judgment, a report in writing and under oath setting forth in detail the manner and form in which they have complied with the provisions set forth in Paragraph A;

3. That Defendants be ordered to transfer ownership of the Domain Name to Plaintiff;

4. That Defendants be directed to account to Plaintiff for all gains, profits and advantages derived from their wrongful acts, together with interest therein;

5. That Plaintiff be awarded compensatory damages in an amount to be determined at trial;

6. That as exemplary damages pursuant to 15 U.S.C. §§ 1117(b) and 1125(c)(2), Plaintiff recover from Defendants three times the amount of Defendants' profits or Plaintiff's damages, whichever is greater, for willful infringement;

7. That as further damages pursuant to 15 U.S.C. § 1117(d), Plaintiff recover from Defendants the amount of Defendants' profits, Plaintiff's damages, or an award of statutory damages in amount of \$100,000 per domain name, whichever is greater, for violation of 15 U.S.C. § 1125(d)(1);

8. That Plaintiff be awarded treble damages pursuant to RCW 19.86.090 for violation of RCW 19.86.020.

9. That Defendants pay to Plaintiff all costs and expenses incurred in this action, including reasonable attorneys' fees; and

10. Granting Plaintiff such other and further relief as the Court may deem just and proper.

Dated this \_\_\_\_\_ day of July, 2013.

1 Respectfully submitted,

2 VANDEBERG JOHNSON & GANDARA LLP

3  
4 By 

5 Daniel Gandara, WSBA #8635  
6 Attorneys for Plaintiff

7 Kieran G. Doyle (*pro hac vice* application to be  
8 filed)  
9 Bridget A. Crawford (*pro hac vice* application to  
10 be filed)  
11 COWAN LIEBOWITZ & LATMAN, P.C.  
12 1133 Avenue of the Americas  
13 New York, New York 10036  
14 (212)790-9200

15 1411067.1



## EXHIBIT A



## World's only Cannabis Vacation Club

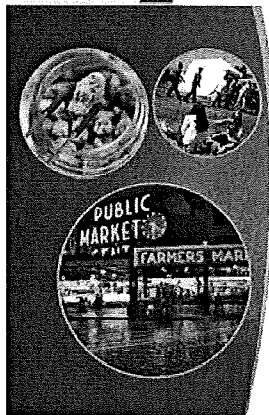
### Cannabis Tourism

Tours start in August  
**BOOK NOW!**

Follow us on

Follow us on

Follow us on

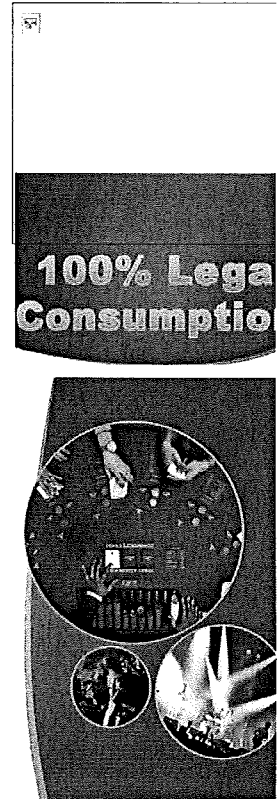


High Times Travel is the world's only cannabis vacation club.  
Offering exclusive travel options for those who wish to partake in legal consumption of cannabis, while enjoying absolute privacy.

High Times Travel offers tours to cannabis friendly cities across the globe from Seattle, WA to Amsterdam and everywhere in between.

Seattle, WA - August 16 - 19, 2013  
Denver, CO  
Kingston, Jamaica  
Amsterdam, Netherlands  
Barcelona, Spain  
Prague, Czech Republic  
Australia

High Times Travel LLC, all rights reserved copyright 2013



Travel & Transportation > [Business Profile](#) Rating

High Times Travel | Seattle, WA 98101 | 800-517-5680

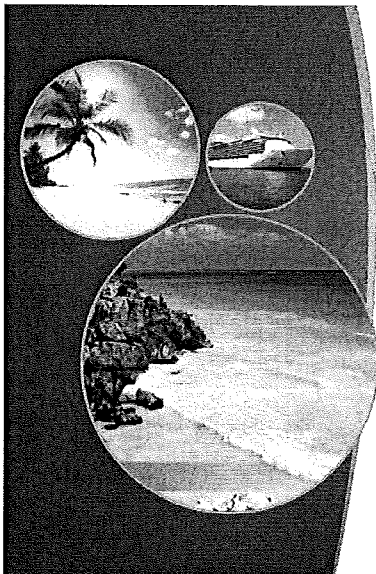


7 Day/ 6 Night Caribbean Cruise Day/ 6 Night Caribbean Cruise  
 Bask in the sun on a Caribbean cruise. When it comes to beautiful beaches and sparkling blue waters, the Caribbean is really in a league of its own. Enjoy pools, whirlpools, state-of-the-art Fitness center and many other on-board entertainment options.

Choose from the elegant main dining room with fantastic food and attentive wait staff or one of the many other on-board dining options. Add to your cruise experience with the choice of a variety of shore and land excursions.

**\*\*Package includes shipboard accommodations, ocean transportation, most meals, some beverages and most on-board entertainment.**

Day 1 - Depart Fort Lauderdale, Florida  
 Day 2 - Cruising  
 Day 3 - George Town, Grand Cayman  
 Day 4 - Falmouth, Jamaica  
 Day 5 - Labadee, Haiti  
 Day 6 - Cruising  
 Day 7 - Fort Lauderdale, Florida



Travel & Transportation > [Business Profile](#) Rating [\(0.0/5.0\)](#)  
 High Times Travel | Seattle, WA 98101 | 800-517-5680





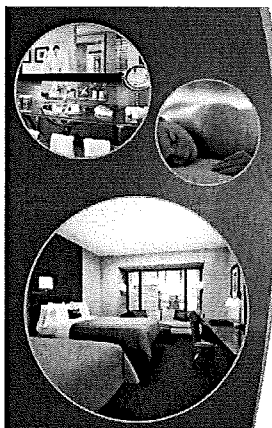
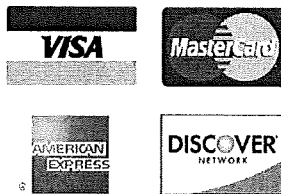
## NOW BOOKING FOR SEATTLE HEMP FEST

AUGUST 16, 17, 18 & 19, 2013

Book by June 15th and use code CANNABISFREEDOM  
to receive 20% off the Membership Package

[bookings@hightimestravel.com](mailto:bookings@hightimestravel.com)

We accept all major credit cards



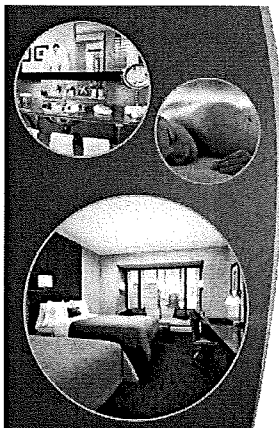
Travel & Transportation » [Business Profile](#) Rating: 4.5/5.0  
High Times Travel | Seattle, WA 98101 | 303-517-6880



High Times Travel is the first and best choice for cannabis tourism.


Enjoy 3 nights at a preferred Seattle hotel offering fine accommodations and a host of amenities, all in an atmosphere of relaxed elegance and sophisticated charm.

Conveniently located in Downtown Seattle and walking distance of many major Seattle attractions, you can easily experience everything Seattle has to offer.



Travel & Transportation > [Business Profile](#) Rating [\(2013-2014\)](#)  
High Times Travel | Seattle, WA 98101 | 800-517-6680







Email or Phone

Password

Log In

☒ Keep me logged in



Forgot your password?



**High Times Travel**  
8 likes · 4 talking about this


Travel/Leisure  
Travel site

About

**8**


Photos Likes


Highlights


**High Times Travel**  
June 13

Spread the news - we are hiring! - Who wants a job? E-mail me at [careers@hightimestravel.com](mailto:careers@hightimestravel.com)

Like · Comment

 Mohawk Alaka likes this.


**Mohawk Alaka** Applied!  
June 26 at 4:00am


**High Times Travel** shared Marijuana.com's photo.  
June 13


Interesting.


<http://bit.ly/Cancer-Gate> -- Cannabinoid Studies And A U.S. Patent Prove The Feds Know Better...


Likes


**Urban Cultivator**  
Kitchen/Cooking


 Like


**The Onion**  
Media/News/Publishing


 Like


**Intoxicated Desserts Alcohol Infused & Gourmet Cupcakes and Confections**  
Bakery · Wedding Planning · Cupcake Shop


 Like

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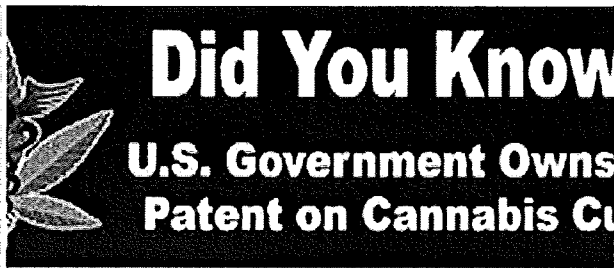
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We are hiring!! Interested in a sales job - please e-mail us at [Careers@hightimestravel.com](mailto:Careers@hightimestravel.com)

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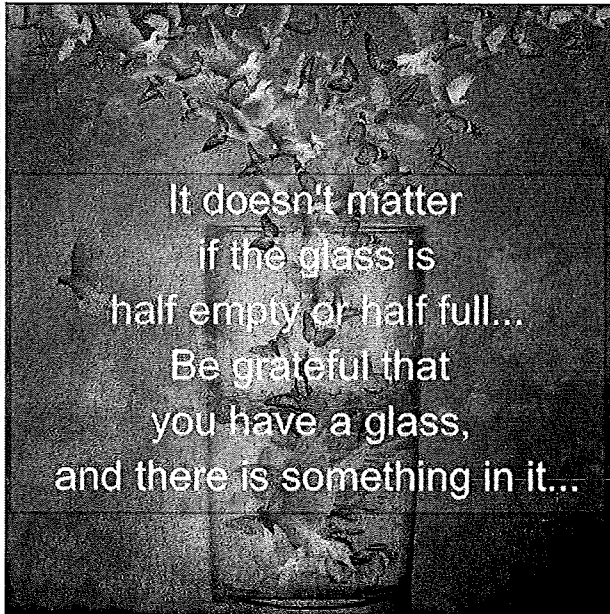


those of you who do not believe that there is an ongoing effort dead set on keeping this free and 100% natural, along with all organic foods, supplements, and more, from a diseased and dying global population... I am here to BLOW YOUR MINDS.....

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High Times Travel shared Karmaceuticals, LLC's photo.  
June 12 · 🌱

I like this one!



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High Times Travel shared 420's photo.  
June 6 · 🌱

Love this!

!! TRUE

~Ray.-

High Times Travel  
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Help spread the love of High Times Travel!! If we can get up to 200 likes by June 15th we will be giving away a free trip to HempFest.

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High Times Travel shared 420 Magazine's photo.  
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This is so true.

IT IS TIME FOR GOVERNMENT TO ACKNOWLEDGE THEIR OWN EVIDENCE THAT CANNABIS PROHIBITION HAS FAILED

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1

High Times Travel shared a link via Cannabis Culture Magazine.  
June 12 · 🌱

So happy to see this!



**Marijuana-Based Medicines Okayed in France | Cannabis Culture**  
[www.cannabisculture.com](http://www.cannabisculture.com)

At the behest of Social Affairs and Health Minister Marisol Touraine, France has modified its Public Health Code to

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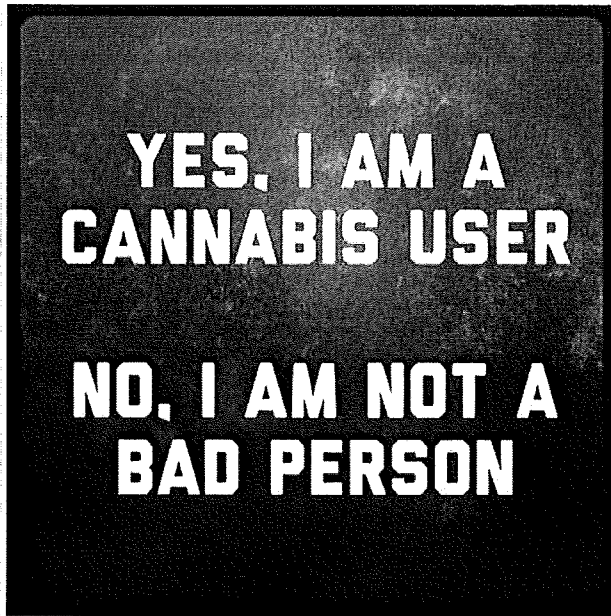
High Times Travel shared a link via Washington Moms for Marijuana.  
June 6 · 🌱



**Oregon Senate votes to allow post-traumatic stress sufferers to use medical marijuana**  
[www.oregonlive.com](http://www.oregonlive.com)

The floor debate revived the fight over Oregon's beloved and maligned medical





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June 6

Check this out!



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High Times Travel  
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We are now in business! Accepting reservations for HempFest in Seattle. Will you join us?

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Mohawk Alaka likes this.

Mohawk Alaka Please tell me you are hiring.  
June 11 at 1:33am

High Times Travel Mohawk Alaka - we are hiring!! Please send your resume to careers@hightimestravel.com and help spread the word.  
June 11 at 1:19pm

High Times Travel changed their cover photo.  
May 29



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May 29



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